

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MARIA JOSE PIZARRO,

Plaintiff, Counterclaim-Defendant,

-against-

EUROS EL TINA RESTAURANT LOUNGE and BILLIARDS
CORP., SANTIAGO QUEZADA, and SANTIAGO
QUEZADA, JR.

Defendants, Counterclaim-Plaintiffs,
Crossclaim-Plaintiff, Third-Party Plaintiffs,

-and-

JOSE E. CASTRO, ELADIO CASTRO PRODUCTIONS,
INC., EMITON FERNANDEZ a.k.a. EMILIO FERNANDEZ,
NARCISO GOMEZ, ZOILIMAR MEJIA a.k.a. ZULIMAR
MEJIA, and TOMAS ANDRES PIZARRO ZEPEDA,

Third-Party Defendants, Crossclaim-Defendants

Ca. No. 20-cv-05783 (AKH)

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JOSE ELADIO CASTRO,

Plaintiff,

,

-against-

SANTIAGO QUEZADA and EUROS EL TINA RESTAURANT
AND BILLIARDS CORP. d/b/a EL TINA LOUNGE,

Defendants.

Ca. No. 21-cv-03445

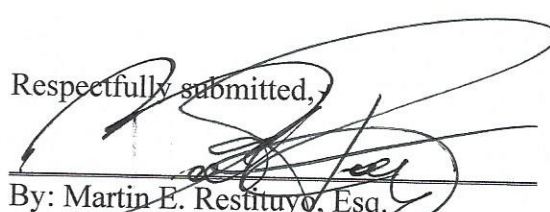
NOTICE OF MOTION TO CONSOLIDATE

Defendants (Counterclaim-Plaintiffs, Crossclaim-Plaintiff, and Third-Party Plaintiffs) Euros el Tina Restaurant Lounge and Billiards Corp., Santiago Quezada, and Santiago Quezada, Jr., (collectively referred to as "Defendants"), by and through counsel, hereby move this Court to consolidate this action, *Maria Jose Pizarro v. Euros el Tina Restaurant Lounge and Billiards Corp., Santiago Quezada, and Santiago Quezada, Jr. (as Defendants) and Jose Eladio Castro, Eladio Productions, Inc., Emiton Fernandez a.k.a Emilio Fernandez, Narciso Gomez, Zoilimar Mejia a.k.a. Zulimar Mejia, and Tomas Andres Pizarro (as Third-Party Defendants)*, 20-cv-5783 (AKH) (the "RICO Action"), and *Jose Eladio Castro v. Santiago Quezada and Euros el Tina Restaurant, Lounge and Billiards Corp.*, Ca. No. 21-cv-03445 (the "Castro Action"), pursuant to Federal Rules of Civil Procedure 42(a). In support of its motion, Defendants refer this Court to its Memorandum of Law in Support and Declaration of Martin E. Restituyo, filed simultaneously herewith.

WHEREFORE, for the reasons stated in the accompanying memorandum of law in support of this motion, Defendants respectfully request that this Court (1) grant their motion to consolidate; and (2) award any other relief that this Court deems just and proper.

Dated: New York, New York
April 19, 2021

Respectfully submitted,


By: Martin E. Restituyo, Esq.
Law Offices of Martin E. Restituyo
1325 Avenue of the Americas, 28th Floor
New York, NY 10019
restituyo@restituyolaw.com

*Attorney for Defendants Euros el Tina
Restaurant Lounge and Billiards Corp.,
Santiago Quezada, and Santiago Quezada,
Jr.*

To: Evan Brustein, Esq.
Brustein Law PLLC
299 Broadway, 17th Floor
New York, New York 10007
T: (212) 233-3900
E: evan@brusteinlaw.com

Attorney for Plaintiff Maria Jose Pizarro

Jesse Rose, Esq.
The Rose Law Group, PLLC
3272 Steinway Street, Suite 503
Astoria, New York 11103
T: (718) 989-1864
E: JRose@TheRoseLawGroup.com

*Attorney for Third-Party Defendant Eladio Castro
and Eladio Castro Productions, Inc.*

EMITON FERNANDEZ
534 West 153rd Street,
Apt. 15
New York, NY 10031

NARCISO GOMEZ
534 West 153rd Street,
Apt. 15
New York, NY 10031